



September 29, 2004

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Ms. Dortch:

We are told the FCC may be under the impression that broadcasters are not sufficiently serving the interests of our local communities and is debating whether or not to impose new rules dictating ways to “correct” this situation. As a broadcaster for over 30 years, I must say in light of all the things local broadcasters do for their local communities every day, week, month and year I am surprised the FCC would have concerns at all.

Independence Television Company in Louisville, Kentucky, which owns and operates WDRB-TV and WFTE-TV (Salem, Indiana), would like to share some of the initiatives we have undertaken to serve our local community. While I think you’ll find this list impressive, I also believe you will find that almost all local broadcasters are equally involved in their communities.

- We provide editorials on both stations to address community needs four days per week (more if necessity dictates). Our tone is deliberately on the conservative side to both reflect our community’s values and to counter a liberal 800 pound gorilla, the daily newspaper.
- We give viewers and community leaders an opportunity to voice their own opinions or to disagree with our positions. This can occur anywhere from twice a month to twice a week, depending on how many people want to voice their concerns. Since it is difficult to get viewers to read their own editorials on the air, we read excerpts from viewer mail on a regular basis.
- We put together an Editorial Advisory Board consisting of the top business, political and community leaders in the Louisville, Kentucky and Southern Indiana area. These people include a U.S. Representative from the 3<sup>rd</sup> Kentucky District, the superintendent of Jefferson County Schools, and the founder of Long John Silver’s. The board includes the Executive Directors of the United Way, the Urban League and Chamber of Commerce. Other members include the general managers of Caesar’s of Indiana (a casino), and the Pepsi bottler, as well as the presidents of Bell South, Fifth Third Bank, Maker’s Mark Distillers, the University of Louisville and Churchill Downs. These people come together once a quarter to share community issues and solutions with each other and me. They are people who can and do make a difference in this community. They also share thoughts with me on a regular basis via email and telephone regarding our editorials. This is a powerful ascertainment tool.
- When our editorials include a “call to action” from viewers, we direct them to our Website at [www.fox41.com](http://www.fox41.com) for contact information and more data. In addition, all our editorials are available on our Website.

- Every single viewer letter or email is answered. I receive between 20 and 300 emails a week, depending on the topics of our editorials. I personally answer each one, usually from home in the evening. Twenty to 40 per week is much more typical than 300.
- We aired two telethons in the past year for the Louisville Orchestra. In both cases we pre-empted Fox network programming to air these locally oriented telethons. Why did we do this? This Orchestra, which is the heart and soul of the cultural community in Louisville, was on the verge of bankruptcy. We donated over \$150,000 worth of production, services and airtime to the Orchestra to help raise awareness and to sell tickets. While we were not the only organization to get behind the Louisville Orchestra in its time of need, our efforts were successful and the Orchestra is back on the road to recovery.
- I serve on five boards of Directors in my role as General Manager of Independence Television Company. Those Boards include the Kentucky Derby Festival, Fund For The Arts, The Louisville Orchestra, Greater Louisville Sports Commission and the Louisville Advertising Federation.
- Annually we produce Junior Achievement's signature fund raising event. This event honors three individuals who have contributed significantly to the community over the years and we produce the video tributes to each recipient as well as provide the audio and video for the event itself. Additionally, we are donating \$75,000 in cash and "in kind" consulting services to Junior Achievement to help them launch Junior Achievement Exchange City. This is a center to give 5<sup>th</sup> and 8<sup>th</sup> graders a chance to better understand how business works.
- We run fund drives in-house for United Way and Fund For The Arts. Our employees and our television stations contribute financially to both worthy organizations.
- The Kentucky Derby Festival is a huge two-week community celebration to kick off the annual Kentucky Derby. It involves a massive fireworks show and air show that attracts more than 750,000 to the banks of the Ohio for the spectacle. It also involves a parade, a marathon, hot air balloons and much, much more. WDRB and WFTE created a motorcycle rally designed to raise money for this event. Last year we generated over \$30,000 for the Festival and this year we believe it will be closer to \$40,000.
- We devote 6 ½ hours per day Monday through Friday to local news. In the past year we expanded our morning news to include the 5:00 to 6:00 am hour. We have the only local news from 7:00 to 9:00 am in the Louisville market and we offer our other newscasts at off-hours to give viewers an alternative. We air newscasts at 11:30 am, 4:00 to 5:00 p.m. and 10:00 to 11:00 p.m.
- Our morning news gives up to the minute traffic and local weather reports every ten minutes without fail.
- Our morning news features at least one live interview per day (sometimes more) with an individual representing a local charity or outreach program. We inform our viewers of what the organization does and how they can become involved. Again, this is a regular feature of *Fox in the Morning*.
- Each Friday morning our morning show features a local band live on the air giving these local musicians broad exposure they can't get any other way.
- Every single morning we send a feature reporter to report live twice an hour for four hours at an interesting local event, festival or business. We were there for the opening of the Frazier Historic Arms Museum, at Louisville Slugger Museum and from the St. James Art Festival. We are somewhere local every day and our focus groups tell us viewers love it.
- For two weeks prior to the Kentucky Derby each spring, WDRB televises our entire morning show, from 5-9 am, live from the backside of Churchill Downs. We interview workout riders, horse experts, owners, jockeys, celebrities, and more. Our ratings are the highest of the year during these two weeks because viewers want the local emphasis on Churchill Downs.
- In Louisville, there is no institution that affects more local people or generates more interest than University of Louisville football and basketball. We originate, produce and televise 20 U of L football and basketball games, most of which run in prime time. This requires we pre-empt our network for these events of local interest. In addition, we also originate, produce and televise 10 "Olympic sports" involving U of L women's teams. These games include softball, soccer and volley ball. Obviously, these aren't big ratings draws, but we do it to broaden the community's exposure to women's sports at U of L.
- Because so many people from the Louisville area vacation or have second homes in Florida, we sent crews down to Florida to cover hurricanes Ivan and Frances because we thought it had significant local interest.

- Both WDRB and WFTE participate in AMBER alerts.
- In the 2002 campaign for 3<sup>rd</sup> District Representatives to the U.S. House, we offered both candidates the opportunity to debate the issues live on television. Unfortunately, both candidates declined.
- Our stations are actively involved with 8 major charitable or community events including, United Way, Fund For The Arts, The Hunger Walk, Junior Achievement, March of Dimes, Louisville Orchestra, Kentucky Derby Festival and Kosair Children's Charities. We are also involved to a lesser degree with several other events.
- Jefferson County Public Schools and the Chamber of Commerce have an initiative called "Every 1 Reads" with a goal of creating an environment where every single child in our community reads at grade level. WDRB and WFTE are actively involved with several volunteers from our station working closely with the program.
- WDRB, Republic Bank and Jewish Hospital have partnered to create a program called "Basics For Kids" to clothe needy children. The objective is to raise \$1.7 million dollars for a trust fund that will spin off enough income to clothe every single needy child in Jefferson County with two pairs of pants, two shirts, socks and underwear.

Believe it or not, Ms. Dortch, it is in the best interest of every local television station to do as much local television as they can. Our viewers want local. They want to know what is happening on their roads, in their schools, and in their community. For us to be successful we must serve our viewer with as much local information and service as we can. Every local television broadcaster I know works in much the same way to serve their local community. We, as general managers, are leaders in our communities and we all want to contribute to the area in which we live. And for the more cynical who don't quite buy the altruistic angle, surely we can believe local stations will continue to serve their local markets because it's also good business.

If you should need any additional information or would like to discuss this further, please don't hesitate to call my direct line number at 502-562-5741.

Sincerely,



Bill Lamb  
President and General Manager  
Independence Television Company